

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: C.R. Bard, Inc.,
Pelvic Repair System Products Liability Litigation.
MDL no. 2187

Civil Action No. 2:12-2126

SHORT FORM COMPLAINT

Come now the Plaintiffs named below, and for Complaint against the Defendants named below, incorporate The Master Complaint in MDL No. 2187 by reference. Plaintiffs further show the court as follows:

1. Female Plaintiff

Emma Petersen

2. Plaintiff Husband

Ronald Petersen

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)

N/A

4. State of Residence

Missouri

5. District Court and Division in which action is to be filed upon transfer from the MDL.

Western District of Missouri, Kansas City Division

6. Defendants (Check Defendants against whom Complaint is made):

(x)A. C.R. Bard, Inc. ("Bard")

()B. Sofradim Production SAS ("Sofradim")

(x)C. Tissue Science Laboratories Limited ("TSL")

(x)D. Other defendants

Ethicon, Inc.

Johnson & Johnson

7. Basis of Jurisdiction

Diversity of Citizenship

8. A. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

Paragraphs 6, 7, & 8

B. Other allegations of jurisdiction and venue

None

9. Defendants' products implanted in Plaintiff (Check products implanted in Plaintiff)

- () A. The Align Urethral Support System;
- () B. The Align TO Urethral Support System;
- () C. The Avaulta Anterior BioSynthetic Support System;
- () D. The Avaulta Posterior BioSynthetic Support System;
- () E. The Avaulta Plus Anterior BioSynthetic Support System;
- () F. The Avaulta Plus Posterior BioSynthetic Support System;
- () G. The Avaulta Solo Anterior Synthetic Support System;
- () H. The Avaulta Solo Posterior Synthetic Support System;
- () I. The InnerLace BioUrethral Support System;

- ☐ J. The Pelvicol Acellular Collagen Matrix;
- ☐ K. The PelviLace BioUrethral Support System;
- ☐ L. The PelviLace TO Trans-obturator BioUrethral Support System;
- ☒ M. The PelviSoft Acellular Collagen BioMesh;
- ☐ N. The Pelvitex Polypropylene Mesh;
- ☐ O. The Uretex SUP Pubourethral Sling;
- ☐ P. The Uretex TO Trans-obturator Urethral Support System;
- ☐ Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ☐ R. The Uretex T03 Trans-obturator Urethral Support System.
- ☒ S. Other

Gynecare Prolift

10. Defendant's Products about which Plaintiff is making a claim. (Check applicable products)

- ☐ A. The Align Urethral Support System;
- ☐ B. The Align TO Urethral Support System;
- ☐ C. The Avaulta Anterior BioSynthetic Support System;
- ☐ D. The Avaulta Posterior BioSynthetic Support System;
- ☐ E. The Avaulta Plus Anterior BioSynthetic Support System;
- ☐ F. The Avaulta Plus Posterior BioSynthetic Support System;
- ☐ G. The Avaulta Solo Anterior Synthetic Support System;
- ☐ H. The Avaulta Solo Posterior Synthetic Support System;
- ☐ I. The InnerLace BioUrethral Support System;
- ☐ J. The Pelvicol Acellular Collagen Matrix;

- ()K. The PelviLace BioUrethral Support System;
- ()L. The PelviLace TO Trans-obturator BioUrethral Support System;
- (x)M. The PelviSoft Acellular Collagen BioMesh;
- ()N. The Pelvitex Polypropylene Mesh;
- ()O. The Uretex SUP Pubourethral Sling;
- ()P. The Uretex TO Trans-obturator Urethral Support System;
- ()Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ()R. The Uretex TO3 Trans-obturator Urethral Support System.
- (x)S. Other

Gynecare Prolift

10. Date of Implantation as to Each Product

December 16, 2004 - Pelvisoft

May 9, 2006 – Gynecare Prolift

11. Hospital where Plaintiff was implanted (including City and State)

University of Kansas Medical Center, Kansas City, Kansas - Pelvisoft

Overland Park Regional Medical Center, Overland Park, Kansas - Gynecare Prolift

12. Implanting Surgeon

Conrad Duncan, M.D. - Pelvisoft

Charles Butrick, M.D. - Gynecare Prolift

13. Counts in the Master Complaint brought by Plaintiffs

(x) Count I

(x) Count II

(x) Count III

(x) Count IV

(x) Count V

(x) Count VI

(x) Count VII (by the Husband)

(x) Count VIII

/s/Derek H. Potts, Esq.

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